DECLARATION OF DENNIS W. RIHN 1 I, Dennis W. Rihn, declare as follows: 2 I am an attorney at law licensed to practice before this Court and all the 3 1. courts of the State of California and one of Plaintiff's attorneys of record in this 4 action. I have personal knowledge of the matters set forth in this declaration. If 5 called and sworn as a witness, I could and would competently testify to everything in 6 7 this declaration. 2. On August 9, 2010, I served defense counsel by mail the requests for 8 9 admissions attached hereto as Exhibits A through D. I have never received any response to any of the requests for admission 10 3. propounded in this action. 11 I declare under penalty of perjury under the laws of the United States of 12 America that the foregoing is true and correct and that this declaration was executed 13 in Pasadena, California, on November 15, 2010. 14 15 16 17 **DENNIS W. RIHN** 18 19 20 22

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EXHIBIT A

1 2 3	ROBERT R. RONNE, ESQ. (SBN 09) LAW OFFICE OF ROBERT R. RON 840 Apollo Street, Suite 307 El Segundo, California 90245 Telephone: (310) 322-1696 Facsimile: (310) 322-3039	02884) INE, APC
4	E-mail: rrr55@sbcglobal.net	
5	DENNIS W. RIHN, ESQ. (SBN 1262 ATTORNEY AT LAW	•
6	215 North Marengo Avenue, Suite 37 Pasadena, CA 91101	6
7	Telephone: (818) 265-0525 Facsimile: (626) 396-1555	
8	E-mail: D.Rihn@Att.Net	
9	A44 C 71 : 1:00 7 1 1 7 1	
10	Attorneys for Plaintiff Edgardo Semir	niano
11		
12		TES DISTRICT COURT
13	CENTRAL DIST	TRICT OF CALIFORNIA
14		
15	EDGARDO SEMINIANO,	FILE NO: CV 10-01673-PSG (JEMx)
16	Plaintiff,	REQUEST FOR ADMISSIONS (RULE 36, FEDERAL RULES OF
17	vs.	CIVIL PROCEDURE)
18	XYRIS ENTERPRISE, INC.; ATKINSON CARE HOME;	JUDGE: HONORABLE JOSEPHINE STATON TUCKER
19	MUQUET DADABHOY; AND TERESITA CASTANEDA,)
20	Defendants.	{
21	- Joseph Land	}
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ı	Request	for Admissions

1 PROPOUNDING PARTY: **EDGARDO SEMINIANO** 2 **RESPONDING PARTY:** XYRIS ENTERPRISE, INC. SET NUMBER: 3 **ONE** Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Edgardo 4 Seminiano hereby requests that Defendant Xyris Enterprise, Inc. admit for purposes 5 of this action only that the following matters are true: 6 **REQUEST FOR ADMISSION NUMBER 1:** 7 Xyris Enterprise, Inc. was a joint employer of Edgardo Seminiano between July 8 9 29, 2008, and December 2, 2009. **REQUEST FOR ADMISSION NUMBER 2:** 10 Atkinson Care Home was a joint employer of Edgardo Seminiano between July 11 29, 2008, and December 2, 2009. 12 **REQUEST FOR ADMISSION NUMBER 3:** 13 Muquet Dadabhoy was a joint employer of Edgardo Seminiano between July 14 29, 2008, and December 2, 2009. 15 **REQUEST FOR ADMISSION NUMBER 4:** 16 Teresita Castaneda was a joint employer of Edgardo Seminiano between July 17 18 29, 2008, and December 2, 2009. 19 **REQUEST FOR ADMISSION NUMBER 5:** Between July 29, 2008, and December 2, 2009, Plaintiff worked as a caregiver 20 at Atkinson Care Home. 21 22 **REQUEST FOR ADMISSION NUMBER 6:** Between July 29, 2008, and December 2, 2009, Atkinson Care Home was a 23 licensed residential care facility for the elderly located at 17035 Atkinson Avenue, 24 Torrance, CA 90504. 25 26 **REQUEST FOR ADMISSION NUMBER 7:** Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy 27 28 and Teresita Castaneda were the licensees of the Atkinson Care Home.

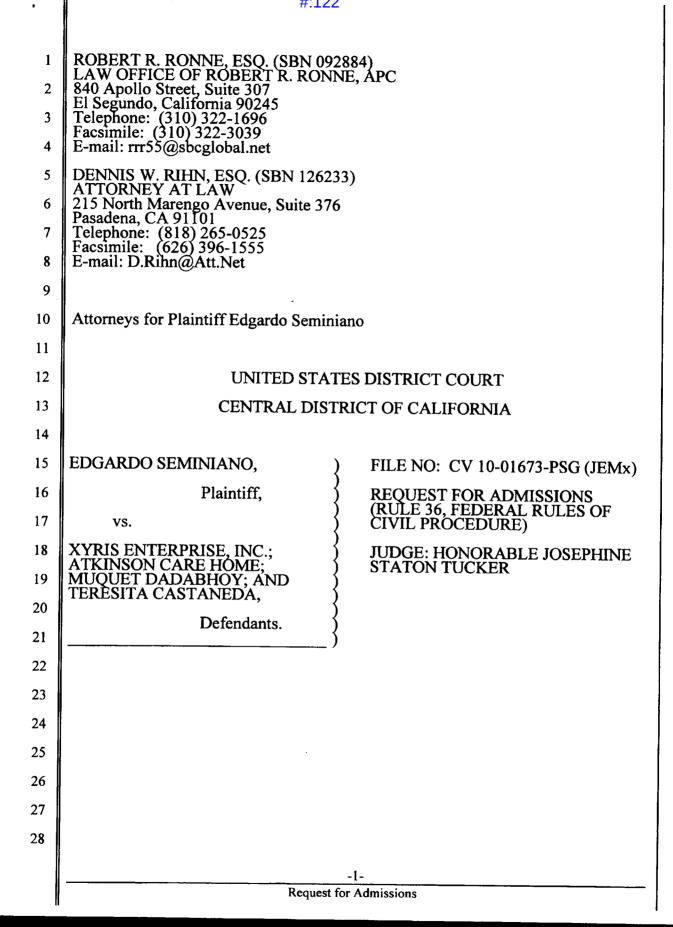
1	REQUEST FOR ADMISSION NUMBER 8:
2	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
3	and Teresita Castaneda jointly operated Atkinson Care Home as partners.
4	REQUEST FOR ADMISSION NUMBER 9:
5	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
6	and Teresita Castaneda were required to operate Atkinson Care Home 24 hours per
7	day, 7 days per week.
8	REQUEST FOR ADMISSION NUMBER 10:
9	Between July 29, 2008, and December 2, 2009, Plaintiff Edgardo Seminiano
10	was required by Defendants Muquet Dadabhoy and Teresita Castaneda to request
11	permission to leave Atkinson Care Home.
12	REQUEST FOR ADMISSION NUMBER 11:
13	Plaintiff Edgardo Seminiano was never unconditionally allowed to leave
14	Atkinson Care Home more than 57 hours in any week between July 29, 2008, and
15	December 2, 2009.
16	REQUEST FOR ADMISSION NUMBER 12:
17	Plaintiff's hours worked each week between July 29, 2008, and December 2,
18	2009, were 111 or more.
19	REQUEST FOR ADMISSION NUMBER 13:
20	Edgardo Seminiano did not have private living quarters while working at
21	Atkinson Care Home.
22	REQUEST FOR ADMISSION NUMBER 14:
23	Between July 29, 2008, and December 2, 2009, Edgardo Seminiano slept on a
24	couch at Atkinson Care Home.
25	REQUEST FOR ADMISSION NUMBER 15:
26	Xyris Enterprise, Inc. owes Edgardo Seminiano \$53,649.18 in unpaid minimun
7	wage and overtime compensation under the Fair Labor Standards Act.
8	

REQUEST FOR ADMISSION NUMBER 16: 1 Xyris Enterprise, Inc. owes Edgardo Seminiano \$53,649.18 in liquidated 2 damages under the Fair Labor Standards Act. 3 **REQUEST FOR ADMISSION NUMBER 17:** 4 Xyris Enterprise, Inc. owes Edgardo Seminiano \$121,855.42 in unpaid 5 overtime compensation under California law. 6 **REQUEST FOR ADMISSION NUMBER 18:** 7 Xyris Enterprise, Inc. owes Edgardo Seminiano \$4,749.36 in compensation for 8 meal periods not received pursuant to California Labor Code Section 226.7. 9 **REQUEST FOR ADMISSION NUMBER 19:** 10 Xyris Enterprise, Inc. owes Edgardo Seminiano \$2,467.20 for continuing 11 wages pursuant to California Labor Code Section 203. 12 **REQUEST FOR ADMISSION NUMBER 20:** 13 Xyris Enterprise, Inc. owes Edgardo Seminiano \$4000.00 for failure to comply 14 with California Labor Code Section 226. 15 16 Date: August 9, 2010 17 LAW OFFICES OF DENNIS W. RIHN 18 19 20 DENNIS W. RIHN, ATTORNEY FOR PLAINTIFF EDGÁRDO SEMINIANO 21 22 23 24 25 26 27 28 Request for Admissions

1 PROOF OF SERVICE BY MAIL I, the undersigned, am a citizen of the United States, a resident of the County of 2 Los Angeles, State of California, over the age of eighteen years, and not a party to the 3 within action. My business addresses is Dennis Rihn, Attorney at Law, 215 North Marengo 4 Avenue, Suite 376, Pasadena, CA 91101. 5 On August 9, 2010, at Pasadena, California, I served the within REQUEST FOR ADMISSIONS (RULE 36, FEDERAL RULES OF CIVIL PROCEDURE) 6 upon the parties interested in the action by placing for collection and mailing a true copy of the document, enclosed in a sealed envelope, postage fully prepaid, addressed 7 as follows: 8 Amy Ghosh, Esq. Law Offices of Amy Ghosh 3255 Wilshire Boulevard 9 10 **Suite 1530** Los Angeles, CA 90010 11 I declare under penalty of perjury under the laws of the United States of 12 America that the foregoing is true and correct. 13 Executed on August 9, 2010, at Pasadena, California. 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 -5-

Request for Admissions

EXHIBIT B



1 PROPOUNDING PARTY: **EDGARDO SEMINIANO** 2 **RESPONDING PARTY:** ATKINSON CARE HOME SET NUMBER: 3 ONE Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Edgardo 4 Seminiano hereby requests that Defendant Atkinson Care Home admit for purposes of 5 this action only that the following matters are true: 6 **REQUEST FOR ADMISSION NUMBER 1:** 7 Xyris Enterprise, Inc. was a joint employer of Edgardo Seminiano between July 8 9 29, 2008, and December 2, 2009. **REQUEST FOR ADMISSION NUMBER 2:** 10 Atkinson Care Home was a joint employer of Edgardo Seminiano between July 11 12 29, 2008, and December 2, 2009. **REQUEST FOR ADMISSION NUMBER 3:** 13 Muquet Dadabhoy was a joint employer of Edgardo Seminiano between July 14 15 29, 2008, and December 2, 2009. **REQUEST FOR ADMISSION NUMBER 4:** 16 Teresita Castaneda was a joint employer of Edgardo Seminiano between July 17 18 29, 2008, and December 2, 2009. **REQUEST FOR ADMISSION NUMBER 5:** 19 Between July 29, 2008, and December 2, 2009, Plaintiff worked as a caregiver 20 21 at Atkinson Care Home. 22 **REQUEST FOR ADMISSION NUMBER 6:** Between July 29, 2008, and December 2, 2009, Atkinson Care Home was a 23 licensed residential care facility for the elderly located at 17035 Atkinson Avenue, 24 25 Torrance, CA 90504. **REQUEST FOR ADMISSION NUMBER 7:** 26 Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy 27 and Teresita Castaneda were the licensees of the Atkinson Care Home. 28

1	REQUEST FOR ADMISSION NUMBER 8:
2	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
3	and Teresita Castaneda jointly operated Atkinson Care Home as partners.
4	REQUEST FOR ADMISSION NUMBER 9:
5	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
6	and Teresita Castaneda were required to operate Atkinson Care Home 24 hours per
7	day, 7 days per week.
8	REQUEST FOR ADMISSION NUMBER 10:
9	Between July 29, 2008, and December 2, 2009, Plaintiff Edgardo Seminiano
10	was required by Defendants Muquet Dadabhoy and Teresita Castaneda to request
11	permission to leave Atkinson Care Home.
12	REQUEST FOR ADMISSION NUMBER 11:
13	Plaintiff Edgardo Seminiano was never unconditionally allowed to leave
14	Atkinson Care Home more than 57 hours in any week between July 29, 2008, and
15	December 2, 2009.
16	REQUEST FOR ADMISSION NUMBER 12:
17	Plaintiff's hours worked each week between July 29, 2008, and December 2,
18	2009, were 111 or more.
19	REQUEST FOR ADMISSION NUMBER 13:
20	Edgardo Seminiano did not have private living quarters while working at
21	Atkinson Care Home.
22	REQUEST FOR ADMISSION NUMBER 14:
23	Between July 29, 2008, and December 2, 2009, Edgardo Seminiano slept on a
24	couch at Atkinson Care Home.
25	REQUEST FOR ADMISSION NUMBER 15:
26	Atkinson Care Home owes Edgardo Seminiano \$53,649.18 in unpaid minimum
27	wage and overtime compensation under the Fair Labor Standards Act.
8	

1	REQUEST FOR ADMISSION NUMBER 16:	
2	Atkinson Care Home owes Edgardo Seminiano \$53,649.18 in liquidated	
3	damages under the Fair Labor Standards Act.	
4	REQUEST FOR ADMISSION NUMBER 17:	
5	Atkinson Care Home owes Edgardo Seminiano \$121,855.42 in unpaid	
6	overtime compensation under California law.	
7	REQUEST FOR ADMISSION NUMBER 18:	
8	Atkinson Care Home owes Edgardo Seminiano \$4,749.36 in compensation for	
9	meal periods not received pursuant to California Labor Code Section 226.7.	
10	REQUEST FOR ADMISSION NUMBER 19:	
11	Atkinson Care Home owes Edgardo Seminiano \$2,467.20 for continuing wage	
12	pursuant to California Labor Code Section 203.	
13	REQUEST FOR ADMISSION NUMBER 20:	
14	Atkinson Care Home owes Edgardo Seminiano \$4000.00 for failure to comply	
15	with California Labor Code Section 226.	
16		
17	Date: August 9, 2010 LAW OFFICES OF DENNIS W. RIHN	
18	By: DW.Tu	
19		
20 21	DENNIS W. RIHN, ATTORNEY FOR PLAINTIFF EDGARDO SEMINIANO	
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1 PROOF OF SERVICE BY MAIL I, the undersigned, am a citizen of the United States, a resident of the County of 2 Los Angeles, State of California, over the age of eighteen years, and not a party to the 3 within action. My business addresses is Dennis Rihn, Attorney at Law, 215 North Marengo 4 Avenue, Suite 376, Pasadena, CA 91101. 5 On August 9, 2010, at Pasadena, California, I served the within REQUEST FOR ADMISSIONS (RULE 36, FEDERAL RULES OF CIVIL PROCEDURE) 6 upon the parties interested in the action by placing for collection and mailing a true copy of the document, enclosed in a sealed envelope, postage fully prepaid, addressed 7 as follows: Amy Ghosh, Esq. 9 Law Offices of Amy Ghosh 3255 Wilshire Boulevard 10 **Suite 1530** Los Angeles, CA 90010 11 I declare under penalty of perjury under the laws of the United States of 12 America that the foregoing is true and correct. 13 Executed on August 9, 2010, at Pasadena, California. 14 15 16 **DENNIS W. RIHN** 17 18 19 20 21 22 23 24 25 26 27 28

EXHIBIT C

Request for Admissions

Case 2:10-cv-01673-JLS-JEM Document 25-1 Filed 11/17/10 Page 16 of 26 Page ID

1	PROPOUNDING PARTY: EDGARDO SEMINIANO
2	RESPONDING PARTY: MUQUET DADABHOY
3	SET NUMBER: ONE
4	Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Edgard
5	Seminiano hereby requests that Defendant Muquet Dadabhoy admit for purposes of
6	this action only that the following matters are true:
7	REQUEST FOR ADMISSION NUMBER 1:
8	Xyris Enterprise, Inc. was a joint employer of Edgardo Seminiano between Ju
9	29, 2008, and December 2, 2009.
10	REQUEST FOR ADMISSION NUMBER 2:
11	Atkinson Care Home was a joint employer of Edgardo Seminiano between Ju
12	29, 2008, and December 2, 2009.
13	REQUEST FOR ADMISSION NUMBER 3:
14	Muquet Dadabhoy was a joint employer of Edgardo Seminiano between July
15	29, 2008, and December 2, 2009.
16	REQUEST FOR ADMISSION NUMBER 4:
17	Teresita Castaneda was a joint employer of Edgardo Seminiano between July
18	29, 2008, and December 2, 2009.
19	REQUEST FOR ADMISSION NUMBER 5:
20	Between July 29, 2008, and December 2, 2009, Plaintiff worked as a caregive
21	at Atkinson Care Home.
22	REQUEST FOR ADMISSION NUMBER 6:
23	Between July 29, 2008, and December 2, 2009, Atkinson Care Home was a
24	licensed residential care facility for the elderly located at 17035 Atkinson Avenue,
25	Torrance, CA 90504.
26	REQUEST FOR ADMISSION NUMBER 7:
27	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
28	and Teresita Castaneda were the licensees of the Atkinson Care Home.
1	Request for Admissions

REQUEST FOR ADMISSION NUMBER 8: 1 Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy 2 and Teresita Castaneda jointly operated Atkinson Care Home as partners. 3 **REQUEST FOR ADMISSION NUMBER 9:** 4 Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy 5 and Teresita Castaneda were required to operate Atkinson Care Home 24 hours per 6 7 day, 7 days per week. **REQUEST FOR ADMISSION NUMBER 10:** 8 Between July 29, 2008, and December 2, 2009, Plaintiff Edgardo Seminiano 9 was required by Defendants Muquet Dadabhoy and Teresita Castaneda to request 10 permission to leave Atkinson Care Home. 11 **REQUEST FOR ADMISSION NUMBER 11:** 12 Plaintiff Edgardo Seminiano was never unconditionally allowed to leave 13 Atkinson Care Home more than 57 hours in any week between July 29, 2008, and 14 15 December 2, 2009. **REQUEST FOR ADMISSION NUMBER 12:** 16 Plaintiff's hours worked each week between July 29, 2008, and December 2, 17 18 2009, were 111 or more. **REQUEST FOR ADMISSION NUMBER 13:** 19 Edgardo Seminiano did not have private living quarters while working at 20 21 Atkinson Care Home. **REQUEST FOR ADMISSION NUMBER 14:** 22 Between July 29, 2008, and December 2, 2009, Edgardo Seminiano slept on a 23 couch at Atkinson Care Home. 24 **REQUEST FOR ADMISSION NUMBER 15:** 25 Muquet Dadabhoy owes Edgardo Seminiano \$53,649.18 in unpaid minimum 26 wage and overtime compensation under the Fair Labor Standards Act. 27 28

REQUEST FOR ADMISSION NUMBER 16: 1 Muquet Dadabhoy owes Edgardo Seminiano \$53,649.18 in liquidated damages 2 under the Fair Labor Standards Act. 3 **REQUEST FOR ADMISSION NUMBER 17:** 4 Muquet Dadabhoy owes Edgardo Seminiano \$121,855.42 in unpaid overtime 5 compensation under California law. 6 **REQUEST FOR ADMISSION NUMBER 18:** 7 Muquet Dadabhoy owes Edgardo Seminiano \$4,749.36 in compensation for 8 meal periods not received pursuant to California Labor Code Section 226.7. 9 **REQUEST FOR ADMISSION NUMBER 19:** 10 Muquet Dadabhoy owes Edgardo Seminiano \$2,467.20 for continuing wages 11 pursuant to California Labor Code Section 203. 12 REQUEST FOR ADMISSION NUMBER 20: 13 Muquet Dadabhoy owes Edgardo Seminiano \$4000.00 for failure to comply 14 with California Labor Code Section 226. 15 16 17 Date: August 9, 2010 LAW OFFICES OF DENNIS W. RIHN 18 19 20 DENNIS W. RIHN, ATTORNEY FOR PLAINTIFF EDGÁRDO SEMINIANO 21 22 23 24 25 26 27 28

1 PROOF OF SERVICE BY MAIL I, the undersigned, am a citizen of the United States, a resident of the County of 2 Los Angeles, State of California, over the age of eighteen years, and not a party to the 3 within action. My business addresses is Dennis Rihn, Attorney at Law, 215 North Marengo 4 Avenue, Suite 376, Pasadena, CA 91101. 5 On August 9, 2010, at Pasadena, California, I served the within REQUEST FOR ADMISSIONS (RULE 36, FEDERAL RULES OF CIVIL PROCEDURE) 6 upon the parties interested in the action by placing for collection and mailing a true copy of the document, enclosed in a sealed envelope, postage fully prepaid, addressed 7 as follows: 8 Amy Ghosh, Esq. Law Offices of Amy Ghosh 3255 Wilshire Boulevard 10 **Suite 1530** Los Angeles, CA 90010 11 I declare under penalty of perjury under the laws of the United States of 12 America that the foregoing is true and correct. 13 Executed on August 9, 2010, at Pasadena, California. 14 15 16 DENNIS W. RIHN 17 18 19 20 21 22 23 24 25 26 27 28 -5-

EXHIBIT D

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1	PROPOUNDING PARTY: EDGA	RDO SEMINIANO	
2	2 RESPONDING PARTY: TERES	SITA CASTANEDA	
3	3 SET NUMBER: ONE		
4	4 Pursuant to Rule 36 of the Feder	al Rules of Civil Procedure, Plaintiff Edgardo	
5	5 Seminiano hereby requests that Defend	ant Teresita Castaneda admit for purposes of	
6	6 this action only that the following matt	ers are true:	
7	7 REQUEST FOR ADMISSION NUMB	ER 1:	
8	8 Xyris Enterprise, Inc. was a joint	employer of Edgardo Seminiano between Ju	
9	9 29, 2008, and December 2, 2009.		
10	10 REQUEST FOR ADMISSION NUMB	ER 2:	
11	Atkinson Care Home was a joint	employer of Edgardo Seminiano between Jul	
12	29, 2008, and December 2, 2009.		
13	REQUEST FOR ADMISSION NUMB	ER 3:	
14	4 Muquet Dadabhoy was a joint en	nployer of Edgardo Seminiano between July	
15	5 29, 2008, and December 2, 2009.	•	
16	6 REQUEST FOR ADMISSION NUMB	ER 4:	
17	7 Teresita Castaneda was a joint en	nployer of Edgardo Seminiano between July	
18	8 29, 2008, and December 2, 2009.		
19	9 REQUEST FOR ADMISSION NUMBI	ER 5:	
20	Between July 29, 2008, and Dece	mber 2, 2009, Plaintiff worked as a caregiver	
21	at Atkinson Care Home.		
22	2 REQUEST FOR ADMISSION NUMBI	ER 6:	
23	Between July 29, 2008, and Dece	mber 2, 2009, Atkinson Care Home was a	
24	4 licensed residential care facility for the	elderly located at 17035 Atkinson Avenue,	
25	Torrance, CA 90504.		
26	6 REQUEST FOR ADMISSION NUMBE	ER 7:	
27	Between July 29, 2008, and Dece	mber 2, 2009, Defendants Muquet Dadabhoy	
28	and Teresita Castaneda were the license	es of the Atkinson Care Home.	
		-2-	

1	REQUEST FOR ADMISSION NUMBER 8:
2	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
3	and Teresita Castaneda jointly operated Atkinson Care Home as partners.
4	REQUEST FOR ADMISSION NUMBER 9:
5	Between July 29, 2008, and December 2, 2009, Defendants Muquet Dadabhoy
6	and Teresita Castaneda were required to operate Atkinson Care Home 24 hours per
7	day, 7 days per week.
8	REQUEST FOR ADMISSION NUMBER 10:
9	Between July 29, 2008, and December 2, 2009, Plaintiff Edgardo Seminiano
10	was required by Defendants Muquet Dadabhoy and Teresita Castaneda to request
11	permission to leave Atkinson Care Home.
12	REQUEST FOR ADMISSION NUMBER 11:
13	Plaintiff Edgardo Seminiano was never unconditionally allowed to leave
14	Atkinson Care Home more than 57 hours in any week between July 29, 2008, and
15	December 2, 2009.
16	REQUEST FOR ADMISSION NUMBER 12:
17	Plaintiff's hours worked each week between July 29, 2008, and December 2,
18	2009, were 111 or more.
19	REQUEST FOR ADMISSION NUMBER 13:
20	Edgardo Seminiano did not have private living quarters while working at
21	Atkinson Care Home.
22	REQUEST FOR ADMISSION NUMBER 14:
23	Between July 29, 2008, and December 2, 2009, Edgardo Seminiano slept on a
24	couch at Atkinson Care Home.
25	REQUEST FOR ADMISSION NUMBER 15:
26	Teresita Castaneda owes Edgardo Seminiano \$53,649.18 in unpaid minimum
7	wage and overtime compensation under the Fair Labor Standards Act.
8	
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1	REQUEST FOR ADMISSION NUMBER 16:
2	Teresita Castaneda owes Edgardo Seminiano \$53,649.18 in liquidated damage
3	under the Fair Labor Standards Act.
4	REQUEST FOR ADMISSION NUMBER 17:
5	Teresita Castaneda owes Edgardo Seminiano \$121,855.42 in unpaid overtime
6	compensation under California law.
7	REQUEST FOR ADMISSION NUMBER 18:
8	Teresita Castaneda owes Edgardo Seminiano \$4,749.36 in compensation for
9	meal periods not received pursuant to California Labor Code Section 226.7.
10	REQUEST FOR ADMISSION NUMBER 19:
11	Teresita Castaneda owes Edgardo Seminiano \$2,467.20 for continuing wages
12	pursuant to California Labor Code Section 203.
13	REQUEST FOR ADMISSION NUMBER 20:
14	Teresita Castaneda owes Edgardo Seminiano \$4000.00 for failure to comply
15	with California Labor Code Section 226.
16	
17	Date: August 9, 2010 LAW OFFICES OF DENNIS W. RIHN
18	X WI
19	By:
20	DENNIS W. RIHN, ATTORNEY FOR PLAINTIFF EDGARDO SEMINIANO
21	TEMINITI EDGARDO SEMINIANO
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Request for Admissions

PROOF OF SERVICE BY MAIL 1 2 I, the undersigned, am a citizen of the United States, a resident of the County of Los Angeles, State of California, over the age of eighteen years, and not a party to the 3 within action. My business addresses is Dennis Rihn, Attorney at Law, 215 North Marengo 4 Avenue, Suite 376, Pasadena, CA 91101. 5 On August 9, 2010, at Pasadena, California, I served the within REQUEST FOR ADMISSIONS (RULE 36, FEDERAL RULES OF CIVIL PROCEDURE) upon the parties interested in the action by placing for collection and mailing a true copy of the document, enclosed in a sealed envelope, postage fully prepaid, addressed 6 7 as follows: 8 Amy Ghosh, Esq. 9 Law Offices of Amy Ghosh 3255 Wilshire Boulevard 10 **Suite 1530** Los Angeles, CA 90010 11 12 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 13 Executed on August 9, 2010, at Pasadena, California. 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 -5-

Request for Admissions